

COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO

CITY OF CINCINNATI,

Plaintiff,

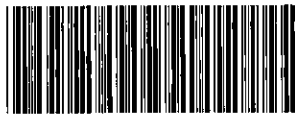
v.

JOHN KLOSTERMAN, et al.,

Defendants.

Case No. A1905588  
(Judge Wende C. Cross)  
(Magistrate Anita P. Berding)

MOTION BY RECEIVER FOR  
APPROVAL OF PAYMENT OF FEES  
AND EXPENSES FROM DECEMBER 1,  
2022 THROUGH AUGUST 31, 2023 AND  
FOR ENTRY OF AN ORDER  
TERMINATING RECEIVERSHIP AND  
DISCHARGING AND RELEASING  
RECEIVER



D139216931

Comes now Konza, LLC as the Receiver appointed in this judgment lien foreclosure action and moves the Court for entry of an order in the form of that tendered herewith (A) approving and authorizing payment to the Receiver for fees and expenses incurred during the period December 1, 2022 through August 31, 2023 in the amount of \$104,438.75 and (B) discharging and releasing the Receiver and terminating the receivership, all on the grounds and for the reasons set forth in the following memorandum.

Respectfully submitted,

/s/ Richard Boydston

Richard Boydston (0022360)  
Counsel for Konza, LLC, Receiver  
Dentons Bingham Greenebaum LLP  
312 Walnut Street #2450  
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CLERK OF COURTS  
HAMILTON COUNTY, OH  
COMMON PLEAS  
2023 SEP 8 P 1:26  
FILED

EXHIBIT

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MEMORANDUM

All of the buildings and lots in this receivership (collectively, the “Properties”) have been sold to HCLRC. The closing on that sale occurred May 1, 2023. The sale concludes the purpose of the Receivership.

The sale was authorized by order entered October 12, 2022 on the Receiver’s motion filed September 26, 2022. An Agreement for Purchase and Sale and Escrow Instructions signed by the Receiver as Seller and HCLRC as Purchaser (the “PSA”) is attached to that motion. Pursuant to the PSA, Prominent Title Company, LLC (“Prominent Title”) is acting as Escrow Agent for the sale proceeds. An order was entered December 20, 2022 granting the Receiver’s motion to direct Prominent Title to pay the Receiver at closing the fees and reimbursement of expenses incurred by the Receiver from the appointment of Receiver through November 30, 2022. Payment was made to the Receiver by Prominent Title at the May 1, 2023 closing in accordance with that order. Prominent Title as Escrow Agent continues to hold \$85,960.82 in escrow pending further order of the Court (the “Escrow Balance”).

By this motion, the Receiver seeks an order approving reimbursement of expenses paid by the Receiver, payment to Greater Cincinnati Water Works (“GCWW”) on the total balance remaining due on all accounts as of the sale closing, payment to Berkshire Hathaway HomeServices Professional Realty/The Gateway Home Services Team (“Gateway”) for property management services January 20 through April 30, 2023, payment to the Receiver’s legal counsel for fees and expenses, and payment to the Receiver for fees. Those fees and expenses (collectively, the “Further Fees and Expenses”) are as follows:

A. for amounts paid by the Receiver to third parties as set forth in Exhibit A.....	\$16,505.50
B. to GCWW as set forth in Exhibit B.....	\$11,230.06
C. to Gateway as set forth in Exhibit C.....	\$10,658.30
D. for legal counsel to the Receiver as set forth in Exhibit D through 8/31/23.....	\$28,654.89
E. for fees to the Receiver set forth in Exhibit E through 8/31/23.....	\$37,390.00
total	\$104,438.75

The Receiver will pay the Escrow Balance in the order of the Further Fees and Expenses listed above. The Receiver has made arrangements with Plaintiff Hamilton County Land Reutilization Corporation for payment of the amount due for the Receiver's fees not paid out of the Escrow Balance.

In addition, the Receiver requests that the Receiver be discharged and released and the receivership terminated on the conditions set forth in the tendered order, namely that there be an injunction on any claims or filings by any person or entity regarding the Receiver, the Receivership, this action, and the Properties in the Receivership and sold by the Receiver to HCLRC.

WHEREFORE, the Receiver respectfully submits that the Motion should be granted and the tendered order entered.

Respectfully submitted,

/s/ Richard Boydston  
Richard Boydston (0022360)  
Counsel for Konza, LLC, Receiver  
Dentons Bingham Greenebaum LLP  
312 Walnut Street #2450  
Cincinnati, Ohio 45202-4028  
513.455.7663  
513.762.7963 (fax)  
[richard.boydston@dentons.com](mailto:richard.boydston@dentons.com)

CERTIFICATE OF SERVICE

I certify that copies of the foregoing and attachments were served on each of the following by ordinary U.S. mail first class postage prepaid on September 8, 2023.

Kelley L. Allesee, Esq.  
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Department of Job & Family Services  
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/s/ Richard Boydston

# EXHIBIT A

## Funds Paid by Receiver to Third Parties

6/5/23  
revisionReceiver out of pocket expenses since  
11/30/22

check	payee	date	amount	purpose
1169	Robbins Kelly Patterson & Tucker	12/13/22	\$1,000.00	legal services for TSO on Klosterman bankruptcy subpoena
1170	Jones Heating & Cooling	1/13/23	2,500.00	replace furnace 649 Steiner
1171	Dial One	1/16/23	258.40	637 and 639 Steiner security
1172	Duke Energy	1/16/23	12.78	639 Steiner electricity
1173	Duke Energy	1/16/23	14.54	637 Steiner electricity
1174	Tara Weber	1/18/23	250.00	reimburse excessive Duke Energy charges for 11 and 12/22 account furnace broken
1175	Gateway Home Services	1/23/23	1,000.00	deposit for property management services
1176	Wells Plumbing	1/26/23	1,025.00	replace gas pipes 654 Steiner
1177	Energy Insurance	3/20/23	5,292.90	liability insurance premium
1178	Dial One Security	3/20/23	45.00	service 637 Steiner on 3/20/23
1179	Dial One Security	4/4/23	258.40	637 and 639 Steiner security
1701	Hamilton County Recorder	4/12/23	390.00	record 3 affidavits on service of notices to commence suit
1180	Dial One Security	4/13/23	90.00	service 637 Steiner on 3/20/23
1182	Duke Energy	4/25/23	50.39	637 Steiner electricity
1183	Duke Energy	4/25/23	55.48	639 Steiner electricity
1184	Michael Simpson Midtown Heat and Air	5/1/23	4,000.00	install 70k btu Heil 80% furnace 654 Steiner on 2/15/23
1189	Duke Energy	5/12/23	6.72	637 Steiner electricity
1190	Duke Energy	5/20/23	25.98	637 Steiner electricity
1722	Hamilton County Recorder	6/2/23	230.00	record 3 affidavits on services of notices to commence suit
		total	\$16,505.59	

# EXHIBIT B

Balance Due on All Accounts at Greater  
Cincinnati Water Works as of  
April 30, 2023

6/23/23  
revision6/14/23 letters from GCWW to Receiver

	address	past due balance
1	628 Delhi	\$2,910.82
2	632 Delhi	103.03
3	636 Delhi	277.77
4	667 Delhi	481.76
5	671 Delhi	409.39
6	679 Delhi	550.30
7	700 Delhi	993.11
8	701 Delhi	522.34
9	703 Delhi	135.19
10	705 Delhi	118.92
11	709 Delhi	55.09
12	714 Delhi	120.79
13	793 Delhi	377.57
14	794 Delhi	572.92
15	685 Halsey	145.82
16	649 Sedam	439.13
17	659 Sedam	826.26
18	702 Sedam	120.28
19	637 Steiner	583.94
20	638 Steiner	351.19
21	639 Steiner	121.10
22	649 Steiner	482.77
23	652 Steiner	406.66
24	654 Steiner	123.91
	total	\$11,230.06



# EXHIBIT C

Balance Due to Berkshire Hathway  
HomeService Professional Realty/The  
Gateway Home Services Team as Property  
Manager January 20 through April 30, 2023



# Rental Owner Ending Balances

As of 8/17/2023, For KONZA LLC

Prepared By: BHHS PRO | The  
Gateway Home Services Team  
2712 Erie Avenue  
Cincinnati, OH 45208

Property	Ending Cash Balance	Deposits Held	Property Reserve	Available Cash	Unpaid bills	Cash less unpaid bills
<b>KONZA LLC</b>						
OH_AM_628 Delhi Avenue	(1,648.82)	0.00	0.00	(1,648.82)	0.00	(1,648.82)
OH_AM_632 Delhi Avenue	161.00	0.00	0.00	161.00	0.00	161.00
OH_AM_636 Delhi Avenue	(1,798.78)	0.00	0.00	(1,798.78)	0.00	(1,798.78)
OH_AM_638 Steiner Avenue	845.00	0.00	0.00	845.00	0.00	845.00
OH_AM_649 Sedam Street	(973.02)	0.00	0.00	(973.02)	0.00	(973.02)
OH_AM_649 Steiner Avenue	(735.39)	0.00	0.00	(735.39)	0.00	(735.39)
OH_AM_652 Steiner Avenue	(2,672.71)	0.00	0.00	(2,672.71)	0.00	(2,672.71)
OH_AM_654 Steiner Avenue	(275.00)	0.00	0.00	(275.00)	0.00	(275.00)
OH_AM_659 Sedam Street	(2,072.89)	0.00	0.00	(2,072.89)	0.00	(2,072.89)
OH_AM_667 Delhi Avenue	1,325.00	0.00	0.00	1,325.00	0.00	1,325.00
OH_AM_673 Delhi Avenue	(525.00)	0.00	0.00	(525.00)	0.00	(525.00)
OH_AM_679 Delhi Avenue	(721.75)	0.00	0.00	(721.75)	0.00	(721.75)
OH_AM_700 Delhi Avenue	(2,079.02)	0.00	0.00	(2,079.02)	0.00	(2,079.02)
OH_AM_701 Delhi Avenue	(675.00)	0.00	0.00	(675.00)	0.00	(675.00)
OH_AM_705 Delhi Avenue	694.05	0.00	0.00	694.05	0.00	694.05
OH_AM_742 Delhi Avenue	(678.97)	0.00	0.00	(678.97)	0.00	(678.97)
OH_AM_753 Delhi Avenue	603.00	0.00	0.00	603.00	0.00	603.00
OH_AM_794 Delhi Avenue	570.00	0.00	0.00	570.00	0.00	570.00
<b>Total for KONZA LLC</b>	<b>(\$10,658.30)</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>(\$10,658.30)</b>	<b>\$0.00</b>	<b>(\$10,658.30)</b>
<b>Grand total for all properties</b>	<b>(\$10,658.30)</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>(\$10,658.30)</b>	<b>\$0.00</b>	<b>(\$10,658.30)</b>

## Summary by rental owner

Rental owner	Ending Cash Balance	Deposits Held	Property Reserve	Available Cash	Unpaid bills	Cash less unpaid bills
KONZA LLC	(10,658.30)	0.00	0.00	(10,658.30)	0.00	(10,658.30)
<b>Grand total for all properties</b>	<b>(\$10,658.30)</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>(\$10,658.30)</b>	<b>\$0.00</b>	<b>(\$10,658.30)</b>

## Property Statement

Prepared By: BHHS PRO | The Gateway Home Services Team  
 2712 Erie Avenue  
 Cincinnati, OH 45208



Statement period 1/1/2020 - 8/17/2023

Statement date 8/17/2023

KONZA LLC

## Summary by property

	OH_AM_628 Delhi Avenue	OH_AM_632 Delhi Avenue	OH_AM_636 Delhi Avenue	OH_AM_638 Steiner Avenue	OH_AM_649 Sedam Street	OH_AM_649 Steiner Avenue
<b>Beginning cash balance</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
<b>+ Additions to cash</b>						
Income	0.00	1,590.00	2,050.00	2,300.00	1,545.00	650.00
Owner contributions	(375.00)	(795.00)	(650.00)	(750.00)	(750.00)	(650.00)
Other additions	2,750.00	1,590.00	650.00	0.00	750.00	650.00
<b>- Subtractions from cash</b>						
Expenses	1,273.82	634.00	3,198.78	705.00	1,768.02	735.39
Owner draws	0.00	0.00	0.00	0.00	0.00	0.00
Other subtractions	2,750.00	1,590.00	650.00	0.00	750.00	650.00
<b>Ending cash balance</b>	<b>(\$1,648.82)</b>	<b>\$161.00</b>	<b>(\$1,798.78)</b>	<b>\$845.00</b>	<b>(\$973.02)</b>	<b>(\$735.39)</b>
<b>- Adjustments</b>						
Tenant security deposits and early payments	0.00	0.00	0.00	0.00	0.00	0.00
Property reserve	0.00	0.00	0.00	0.00	0.00	0.00
<b>Available for payment</b>	<b>(\$1,648.82)</b>	<b>\$161.00</b>	<b>(\$1,798.78)</b>	<b>\$845.00</b>	<b>(\$973.02)</b>	<b>(\$735.39)</b>

	OH_AM_652 Steiner Avenue	OH_AM_654 Steiner Avenue	OH_AM_659 Sedam Street	OH_AM_667 Delhi Avenue	OH_AM_673 Delhi Avenue	OH_AM_679 Delhi Avenue
<b>Beginning cash balance</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
<b>+ Additions to cash</b>						
Income	0.00	250.00	1,650.00	2,000.00	0.00	2,400.00

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 Cincinnati, OH 45208



Statement period 1/1/2020 - 8/17/2023

	OH-AM-652 Steiner Avenue	OH-AM-654 Steiner Avenue	OH-AM-659 Sedam Street	OH-AM-667 Delhi Avenue	OH-AM-673 Delhi Avenue	OH-AM-679 Delhi Avenue
Owner contributions	(700.00)	0.00	(1,500.00)	0.00	0.00	(1,200.00)
Other additions	700.00	0.00	4,050.00	0.00	0.00	2,400.00
<b>– Subtractions from cash</b>						
Expenses	1,972.71	525.00	2,222.89	675.00	525.00	1,921.75
Owner draws	0.00	0.00	0.00	0.00	0.00	0.00
Other subtractions	700.00	0.00	4,050.00	0.00	0.00	2,400.00
<b>Ending cash balance</b>	<b>(\$2,672.71)</b>	<b>(\$275.00)</b>	<b>(\$2,072.89)</b>	<b>\$1,325.00</b>	<b>(\$525.00)</b>	<b>(\$721.75)</b>
<b>– Adjustments</b>						
Tenant security deposits and early payments	0.00	0.00	0.00	0.00	0.00	0.00
Property reserve	0.00	0.00	0.00	0.00	0.00	0.00
<b>Available for payment</b>	<b>(\$2,672.71)</b>	<b>(\$275.00)</b>	<b>(\$2,072.89)</b>	<b>\$1,325.00</b>	<b>(\$525.00)</b>	<b>(\$721.75)</b>

	OH-AM-700 Delhi Avenue	OH-AM-701 Delhi Avenue	OH-AM-705 Delhi Avenue	OH-AM-742 Delhi Avenue	OH-AM-753 Delhi Avenue	OH-AM-794 Delhi Avenue
<b>Beginning cash balance</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
<b>+ Additions to cash</b>						
Income	1,175.00	0.00	1,400.00	650.00	1,170.00	1,800.00
Owner contributions	(1,250.00)	0.00	0.00	(650.00)	0.00	(600.00)
Other additions	1,500.00	0.00	700.00	650.00	0.00	1,900.00
<b>– Subtractions from cash</b>						
Expenses	2,004.02	675.00	705.95	678.97	567.00	630.00
Owner draws	0.00	0.00	0.00	0.00	0.00	0.00

## Property Statement

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Statement period 1/1/2020 - 8/17/2023

	OH-AM-700 Delhi Avenue	OH-AM-701 Delhi Avenue	OH-AM-705 Delhi Avenue	OH-AM-742 Delhi Avenue	OH-AM-753 Delhi Avenue	OH-AM-794 Delhi Avenue
Other subtractions	1,500.00	0.00	700.00	650.00	0.00	1,900.00
<b>Ending cash balance</b>	<b>(\$2,079.02)</b>	<b>(\$675.00)</b>	<b>\$694.05</b>	<b>(\$678.97)</b>	<b>\$603.00</b>	<b>\$570.00</b>
<b>– Adjustments</b>						
Tenant security deposits and early payments	0.00	0.00	0.00	0.00	0.00	0.00
Property reserve	0.00	0.00	0.00	0.00	0.00	0.00
<b>Available for payment</b>	<b>(\$2,079.02)</b>	<b>(\$675.00)</b>	<b>\$694.05</b>	<b>(\$678.97)</b>	<b>\$603.00</b>	<b>\$570.00</b>

	<b>All properties</b>
<b>Beginning cash balance</b>	<b>\$0.00</b>
<b>+ Additions to cash</b>	
Income	20,630.00
Owner contributions	(9,870.00)
Other additions	18,290.00
<b>– Subtractions from cash</b>	
Expenses	21,418.30
Owner draws	0.00
Other subtractions	18,290.00
<b>Ending cash balance</b>	<b>(\$10,658.30)</b>
<b>– Adjustments</b>	
Tenant security deposits and early payments	0.00
Property reserve	0.00
<b>Available for payment</b>	<b>(\$10,658.30)</b>

## Property Statement

Prepared By: BHHS PRO | The Gateway Home Services Team  
 2712 Erie Avenue  
 Cincinnati, OH 45208



Statement period 1/1/2020 - 8/17/2023

Statement date 8/17/2023

## Income statement

	OH AM 628 Delhi Avenue	OH AM 632 Delhi Avenue	OH AM 636 Delhi Avenue	OH AM 638 Steiner Avenue	OH AM 649 Sedam Street	OH AM 649 Steiner Avenue
<b>Income</b>						
Late Fee Income	0.00	0.00	0.00	50.00	0.00	0.00
Rent Income	0.00	1,590.00	2,050.00	2,250.00	1,545.00	650.00
<b>Total income</b>	<b>\$0.00</b>	<b>\$1,590.00</b>	<b>\$2,050.00</b>	<b>\$2,300.00</b>	<b>\$1,545.00</b>	<b>\$650.00</b>
<b>Expense</b>						
Legal and Professional Fees	477.05	0.00	0.00	0.00	238.53	0.00
Maintenance and Repairs	196.77	0.00	0.00	0.00	190.99	210.39
Maintenance and Repairs - Appliance Replacement	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - HVAC/BOILER/FURNACE Repairs	0.00	0.00	0.00	0.00	79.00	0.00
Maintenance and Repairs - HVAC/BOILER/FURNACE Replacement	0.00	0.00	0.00	0.00	630.00	0.00
Maintenance and Repairs - Mold Remediation	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - Plumbing	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - Roof Repairs	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - Trash Outs/Set Out	0.00	0.00	0.00	0.00	0.00	0.00
Management Fees	600.00	634.00	640.00	705.00	629.50	525.00
Repairs	0.00	0.00	0.00	0.00	0.00	0.00
Utilities - Electric and Gas	0.00	0.00	0.00	0.00	0.00	0.00
Utilities - Water and Sewer	0.00	0.00	2,558.78	0.00	0.00	0.00
<b>Total expenses</b>	<b>\$1,273.82</b>	<b>\$634.00</b>	<b>\$3,198.78</b>	<b>\$705.00</b>	<b>\$1,768.02</b>	<b>\$735.39</b>

## Property Statement

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2712 Erie Avenue  
Cincinnati, OH 45208



Statement period 1/1/2020 - 8/17/2023

	OH AM 628 Delhi Avenue	OH AM 632 Delhi Avenue	OH AM 636 Delhi Avenue	OH AM 638 Steiner Avenue	OH AM 649 Sedam Street	OH AM 649 Steiner Avenue
<b>Net income</b>	<b>(\$1,273.82)</b>	<b>\$956.00</b>	<b>(\$1,148.78)</b>	<b>\$1,595.00</b>	<b>(\$223.02)</b>	<b>(\$85.39)</b>

	OH AM 652 Steiner Avenue	OH AM 654 Steiner Avenue	OH AM 659 Sedam Street	OH AM 667 Delhi Avenue	OH AM 673 Delhi Avenue	OH AM 679 Delhi Avenue
<b>Income</b>						
Late Fee Income	0.00	0.00	0.00	50.00	0.00	0.00
Rent Income	0.00	250.00	1,650.00	1,950.00	0.00	2,400.00
<b>Total income</b>	<b>\$0.00</b>	<b>\$250.00</b>	<b>\$1,650.00</b>	<b>\$2,000.00</b>	<b>\$0.00</b>	<b>\$2,400.00</b>

**Expense**

Legal and Professional Fees	0.00	0.00	0.00	0.00	0.00	94.33
Maintenance and Repairs	698.88	0.00	0.00	0.00	0.00	767.92
Maintenance and Repairs - Appliance Replacement	0.00	0.00	692.06	0.00	0.00	0.00
Maintenance and Repairs - HVAC/BOILER/FURNACE Repairs	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - HVAC/BOILER/FURNACE Replacement	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - Mold Remediation	357.50	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - Plumbing	391.33	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - Roof Repairs	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - Trash Outs/Set Out	0.00	0.00	0.00	0.00	0.00	269.50
Management Fees	525.00	525.00	765.00	675.00	525.00	790.00
Repairs	0.00	0.00	67.38	0.00	0.00	0.00

## Property Statement

Prepared By: BHHS PRO | The Gateway Home Services Team  
 2712 Erie Avenue  
 Cincinnati, OH 45208



Statement period 1/1/2020 - 8/17/2023

	OH-AM-652 Steiner Avenue	OH-AM-654 Steiner Avenue	OH-AM-659 Sedam Street	OH-AM-667 Delhi Avenue	OH-AM-673 Delhi Avenue	OH-AM-679 Delhi Avenue
Utilities - Electric and Gas	0.00	0.00	698.45	0.00	0.00	0.00
Utilities - Water and Sewer	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total expenses</b>	<b>\$1,972.71</b>	<b>\$525.00</b>	<b>\$2,222.89</b>	<b>\$675.00</b>	<b>\$525.00</b>	<b>\$1,921.75</b>
<b>Net income</b>	<b>(\$1,972.71)</b>	<b>(\$275.00)</b>	<b>(\$572.89)</b>	<b>\$1,325.00</b>	<b>(\$525.00)</b>	<b>\$478.25</b>

	OH-AM-700 Delhi Avenue	OH-AM-701 Delhi Avenue	OH-AM-705 Delhi Avenue	OH-AM-742 Delhi Avenue	OH-AM-753 Delhi Avenue	OH-AM-794 Delhi Avenue
<b>Income</b>						
Late Fee Income	0.00	0.00	0.00	0.00	0.00	0.00
Rent Income	1,175.00	0.00	1,400.00	650.00	1,170.00	1,800.00
<b>Total income</b>	<b>\$1,175.00</b>	<b>\$0.00</b>	<b>\$1,400.00</b>	<b>\$650.00</b>	<b>\$1,170.00</b>	<b>\$1,800.00</b>
<b>Expense</b>						
Legal and Professional Fees	238.53	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs	75.49	0.00	0.00	113.97	0.00	0.00
Maintenance and Repairs - Appliance Replacement	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - HVAC/BOILER/FURNACE Repairs	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - HVAC/BOILER/FURNACE Replacement	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - Mold Remediation	522.50	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - Plumbing	0.00	0.00	0.00	0.00	0.00	0.00
Maintenance and Repairs - Roof Repairs	450.00	0.00	0.00	0.00	0.00	0.00



## Property Statement.

Prepared By: BHHS PRO | The Gateway Home Services Team  
 2712 Erie Avenue  
 Cincinnati, OH 45208



Statement period 1/1/2020 - 8/17/2023

	OH-AM-700 Delhi Avenue	OH-AM-701 Delhi Avenue	OH-AM-705 Delhi Avenue	OH-AM-742 Delhi Avenue	OH-AM-753 Delhi Avenue	OH-AM-794 Delhi Avenue
Maintenance and Repairs - Trash Outs/Set Out	0.00	0.00	0.00	0.00	0.00	0.00
Management Fees	717.50	675.00	615.00	565.00	567.00	630.00
Repairs	0.00	0.00	0.00	0.00	0.00	0.00
Utilities - Electric and Gas	0.00	0.00	90.95	0.00	0.00	0.00
Utilities - Water and Sewer	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total expenses</b>	<b>\$2,004.02</b>	<b>\$675.00</b>	<b>\$705.95</b>	<b>\$678.97</b>	<b>\$567.00</b>	<b>\$630.00</b>
<b>Net income</b>	<b>(\$829.02)</b>	<b>(\$675.00)</b>	<b>\$694.05</b>	<b>(\$28.97)</b>	<b>\$603.00</b>	<b>\$1,170.00</b>

**All properties:****Income**

Late Fee Income	100.00
Rent Income	20,530.00
<b>Total income</b>	<b>\$20,630.00</b>

**Expense**

Legal and Professional Fees	1,048.44
Maintenance and Repairs	2,254.41
Maintenance and Repairs - Appliance Replacement	692.06
Maintenance and Repairs - HVAC/BOILER/FURNACE Repairs	79.00
Maintenance and Repairs - HVAC/BOILER/FURNACE Replacement	630.00
Maintenance and Repairs - Mold Remediation	880.00

## Property Statement

Prepared By: BHHS PRO | The Gateway Home Services Team  
 2712 Erie Avenue  
 Cincinnati, OH 45208



Statement period 1/1/2020 - 8/17/2023

Statement date 8/17/2023

All properties	
Maintenance and Repairs - Plumbing	391.33
Maintenance and Repairs - Roof Repairs	450.00
Maintenance and Repairs - Trash Outs/Set Out	269.50
Management Fees	11,308.00
Repairs	67.38
Utilities - Electric and Gas	789.40
Utilities - Water and Sewer	2,558.78
<b>Total expenses</b>	<b>\$21,418.30</b>
<b>Net income</b>	<b>(\$788.30)</b>

**EXHIBIT D**  
**Fees and Expenses Due to Dentons Bingham**  
**Greenebaum LLP**

Dentons Bingham Greenebaum LLP

Konza LLC  
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Invoice Date: September 7, 2023  
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1835 Dexter Avenue  
Cincinnati, OH 45206Account No.: 131170.000002  
Invoice No.: \*\*\*\*\*  
Invoice Date: September 7, 2023

KLOSTERMAN

FOR PROFESSIONAL SERVICES RENDERED THROUGH AUGUST 31, 2023:

# DRAFT

DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
11/30/22	RB	Inspect properties with Ronald Shouse, Luke Herman and Joseph Lentine; phone conferences Mr. Lentine	0.20	70.00
12/01/22	RB	Phone conferences Joseph Lentine; emails Erin Lovitt	0.10	35.00
12/02/22	RB	Phone conferences Joseph Lentine; emails Angel Strunk, Mr. Lentine, Kelley Allesee; edit rent roll and organize papers for Landbank	0.70	245.00
12/05/22	RB	Edit fee applications; emails Angel Strunk, Joseph Lentine, Kelley Allesee and Erica Faaborg; phone conferences Dial One Security, Mr. Lentine; edit operation reports; review and file receiver's report	0.50	175.00
12/06/22	RB	Prepare for and attend status report before Magistrate Berding; phone conference Kelley Allesee; office conferences Joseph Lentine; properties drive by	1.00	350.00
12/07/22	RB	Office conference Joseph Lentine; emails and texts Mr. Lentine; properties drive by	0.20	70.00
12/08/22	RB	Phone conferences Joseph Lentine, Charles Pritchard; emails Mr. Pritchard, Kelley Allesee, Melissa Darby, Erica Faaborg, Kate Burroughs and Shannon Price	0.30	105.00
12/09/22	RB	Emails Angel Strunk, Joseph Lentine, Chuck Pritchard; phone conferences Mr. Lentine, Chuck Pritchard; review pictures for Ron Shouse inspection list	0.10	35.00
12/12/22	RB	Emails Kelley Allesee, Michael Galasso and Joseph Lentine; phone conference Mr. Lentine	0.20	70.00
12/13/22	RB	Phone conferences and emails Joseph Lentine; properties drive by and photos	0.10	35.00

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DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
12/14/22	RB	Conferences Joseph Lentine; properties drive by; email Ron Shouse	0.10	35.00
12/15/22	RB	Phone conferences Joseph Lentine	0.10	35.00
12/16/22	RB	Review 12/14/22 John Klosterman filing; emails Kelley Allesee; phone conferences Joseph Lentine, Ms. Allesee and Shannon Price	0.20	70.00
12/19/22	RB	Prepare for and attend hearing before Magistrate Berding; conference Kelley Allesee, Kate Burroughs and Shannon Price; emails Ms. Allesee	0.50	175.00
12/20/22	RB	File Magistrate's Order and have served; phone conferences Joseph Lentine and Robert Calabreze	0.40	140.00
12/22/22	RB	Phone conferences Tara Weber, Joseph Lentine and Kelley Allesee; email Ms. Weber	0.20	70.00
12/23/22	RB	Phone conferences Joseph Lentine	0.10	35.00
12/26/22	RB	Phone conferences Joseph Lentine	0.10	35.00
12/27/22	RB	Phone conferences Joseph Lentine, GCWW; emails GCWW and Kelley Allesee	0.10	35.00
12/28/22	RB	Phone conferences Joseph Lentine	0.10	35.00
12/29/22	RB	Review John Klosterman 12/28/22 filing and draft response; emails Kelley Allesee and Jennifer Donathan; phone conferences Joseph Lentine	0.80	280.00
12/30/22	RB	Conference Alexis Royse ; phone conferences Jennifer Donathan and Joseph Lentine; emails Kelley Allesee and Tara Weber; draft response to John Klosterman 12/28/22 filing	1.10	385.00
01/01/23	RB	Phone conferences Joseph Lentine; review 12/21/22 court of appeals decision in John Klosterman criminal case	0.10	35.00
01/02/23	RB	Email Kelley Allesee	0.10	35.00
01/03/23	RB	Phone conferences Joseph Lentine; emails Kelley Allesee	0.10	35.00
01/04/23	RB	Email Joseph Lentine	0.10	35.00
01/05/23	RB	Phone conferences Joseph Lentine	0.10	35.00
01/06/23	RB	Edit response to John Klosterman 12/28/22 filing	0.70	245.00
01/09/23	RB	Emails Joseph Lentine; conference Allen Teetor; properties drive by; phone conferences Jennifer Donathan, Liz Eddy; conference Laura Finke; review Landbank motion; attend to filing and service of receiver's report	0.30	105.00
01/10/23	RB	Phone conferences Dion Crockett, Joseph Lentine and	0.20	70.00

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DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
		Kelley Allesee; emails Ms. Allesee and Erica Faaborg		
01/11/23	RB	Phone conferences Dion Crockett, Joseph Lentine, Jan Michele Lemon Kenney and others, Duke Energy; emails Allie Rice, Jennifer Donathan, Liz Eddy	0.20	70.00
01/12/23	RB	Phone conferences Duke Energy, Joseph Lentine and Robert Jones; emails John Shrider and Kelley Allesee	0.40	140.00
01/13/23	RB	Phone conferences Joseph Lentine, Robert Jones, Shannon Price, Allie Rice; meeting Mr. Jones; properties drive by; emails Stacy Purcell and Shannon Price, John Schrider	0.50	175.00
01/15/23	RB	Properties drive by; email Stacy Purcell (1/14/23) and file review; texts Allie Rice	0.20	70.00
01/17/23	RB	Emails Allie Rice, Angel Strunk, Joseph Lentine, Shannon Price, Stacy Purcell; phone conferences Mr. Lentine, Ms. Rice, Ms. Purcell and Duke Energy	0.30	105.00
01/18/23	RB	Phone conferences Joseph Lentine and Kelley Allesee; emails Mr. Lentine and Erin Lovitt	0.20	70.00
01/19/23	RB	Phone conferences Allie Rice and Kelley Allesee; emails Ms. Rice, Ms. Allesee, Angel Strunk, Brian Pyles; office conference Ms. Allesee; emails Joseph Lentine, Ms. Strunk, Ms. Rice	1.00	350.00
01/20/23	RB	Phone conferences Allie Rice, Joseph Lentine, Patrick Hanley; emails Kelley Allesee, Ms. Rice and Mr. Lentine	0.50	175.00
01/21/23	RB	Phone conference Joseph Lentine	0.10	35.00
01/23/23	RB	Phone conferences Joseph Lentine and Kelley Allesee; emails Mr. Lentine, Erin Lovett; office conference Mr. Lentine; review Gateway contract; deliver letter to Allie Rice; properties drive by; meeting with Mr. Lentine	1.00	350.00
01/24/23	RB	Emails Jennifer Donathan, Brian Pyles, Stacy Purcell, Joseph Lentine, Erin Lovitt; prepare for and attend meeting with Kelley Allesee and Joseph Lentine; phone conferences Ms. Allesee	1.50	525.00
01/25/23	RB	Emails Stacey Purcell, Joseph Lentine, Allie Rice, Jennifer Donathan, Brian Pyles, Kelley Allesee, Robert Calabreze; phone conferences Allen Teetor, Ms. Donathan, Ms. Allesee; inspect 654 Steiner; properties drive by; conference Ms. Allesee and Mr. Lentine; letter Ty Foster; review Gateway site	1.00	350.00
01/26/23	RB	Phone conferences Bobby Thompson, Allie Rice, Joseph Lentine; emails Ms. Rice, Mr. Lentine; texts Robert Wells	0.30	105.00

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DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
01/27/23	RB	Phone conference Joseph Lentine; emails Allie Rice; review John Klosterman filing	0.20	70.00
01/28/23	RB	Phone conference Joseph Lentine	0.10	35.00
01/29/23	RB	Phone conference Kelley Allesee	0.50	175.00
01/30/23	RB	Phone conferences Ty Foster, Joseph Lentine, Jennifer Donathan	0.10	35.00
01/31/23	RB	Prepare for and attend appearance before Magistrate Berding; post appearance conferences Joseph Lentine and Amy Higgins and Kelley Allesee; phone conference Jennifer Donathan; emails Alexis Royse	1.50	525.00
02/01/23	RB	Phone conferences Allie Rice and David Donnett, Robert Jones, Matthew Flannery, Kelley Allesee; emails Ms. Rice, Joseph Lentine, Stacy Purcell; review 1/31/23 case filings	0.70	245.00
02/02/23	RB	Phone conferences Robert Jones, Joseph Lentine	0.10	35.00
02/03/23	RB	Properties drive by; text Allie Rice; phone conferences Matthew Flannery, Ms. Rice, Kelley Allesee and Philip Denning; review John Klosterman filings; email Deanna White	0.30	105.00
02/06/23	RB	Phone conference Allie Rice; texts Allen Teetor; emails Mr. Rice, Jennifer Donathan, Joseph Lentine, Angel Strunk, Tara Weber	0.30	105.00
02/07/23	RB	Phone conferences Tara Weber, Joseph Lentine; emails Allie Rice, Angel Strunk, Ms. Weber; voice mail Lisa Massingill	0.20	70.00
02/08/23	RB	Emails Allie Rice, Megan Moore, Kelley Allesee; phone conferences Joseph Lentine, Angel Strunk and Ms. Allesee; emails from Cincinnati Fire Department	0.30	105.00
02/10/23	RB	Phone conferences Joseph Lentine, Allie Rice, St. Vincent de Paul/Mipaandbob and email to them	0.10	35.00
02/13/23	RB	Emails David Boe; phone conferences Joseph Lentine and Kelley Allesee; review Landbank filing	0.20	70.00
02/14/23	RB	Emails Joseph Lentine, Mark Bissinger, Allie Rice, Davie Boe	0.20	70.00
02/15/23	RB	Phone conference Joseph Lentine; emails Susan Zurface, Mr. Lentine, Allie Rice	0.20	70.00
02/16/23	RB	Phone conferences Joseph Lentine; emails Mr. Lentine and Allie Rice	0.20	70.00
02/17/23	RB	Phone conferences Joseph Lentine and Kelley Allesee; review receiver's 1/1-20/23 report for filing and have filed and served; review Ms. Allesee email and	0.40	140.00



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DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
		attachments; emails Ms. Allesee		
02/20/23	RB	Emails Allie Rice, Megan Moore, Rumpke and Joseph Lentine	0.10	35.00
02/21/23	RB	Review Kelley Allesee 2/20/23 letter and enclosures; emails Megan Moore, Energy Insurance, Matthew Kincaid, Allie Rice; phone conferences Joseph Lentine; prepare for and attend hearing before Magistrate Berding; conference Ms. Allesee and Amy Higgins	1.50	525.00
02/22/23	RB	Emails Megan Moore, Jennifer Donathan, Kelley Allesee	0.10	35.00
02/23/23	RB	Draft Civ.R.45(B) motion; phone conference Allie Rice and Megan Moore; review Gateway portal; emails Ms. Rice, Ms. Moore, Mark Bessinger, Jennifer Donathan and Joseph Lentine; meeting with Mr. Lentine; properties drive by	1.00	350.00
02/24/23	RB	Phone conferences Matthew Flannery; emails Allie Rice, Nicholas DiNardo, Kelley Allesee; draft chart on rent deposits; edit Civ.R. 54(B) motion	0.50	175.00
02/27/23	RB	Edit Civ.R. 54(B) motion; phone conference Kelley Allesee; edit 12/1/22-2/24/23 fees and expenses summary; emails Ms. Allesee	0.50	175.00
02/28/23	RB	Internet searches Sedamsville; phone conferences Joseph Lentine and Kelley Allesee; emails Allie Rice and Mr. Lentine	0.70	245.00
03/01/23	RB	Phone conference Allie Rice, David Mussari, Kelley Allesee, Philip Denning, Madeline Otilie, Randy Tucker; emails Ms. Rice, Mr. Lentine, Ms. Allesee, Amy Higgins	0.50	175.00
03/02/23	RB	Review Joseph Lentine filings; emails Matthew Flannery, Allie Rice, Nicholas DiNardo, Michelle Alfini, Joseph Lentine; phone conferences Charles Prichard, Mr. DiNardo, Ms. Flannery, Kelley Allesee	0.70	245.00
03/03/23	RB	Emails Kelley Allesee, Amy Higgins, Matthew Flannery; Nicholas DiNardo, phone conferences Ms. Allesee and Mr. Flannery	0.20	70.00
03/04/23	RB	Prepare for meeting with Legal Aid, City and Landbank	0.10	35.00
03/05/23	RB	Prepare for Zoom meeting with Legal Aid, City and Landbank; draft current tenant charts	0.20	70.00
03/06/23	RB	Emails Kelley Allesee, Stacy Purcell, Allie Rice, Lonnie Wise; Amy Higgins; draft receiver's Gateway income and expense report 1/20-3/4/23 and letter to tenants; review Joseph Lentine mechanics liens; prepare for and attend Legal Aid, City and Landbank	0.50	175.00



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DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
		conference call; phone conferences Ms. Allesee, Selena Reeder, Ms. Higgins, Michelle Alfini, Ms. Rice		
03/07/23	RB	Review John Klosterman filings; emails Allie Rice	0.20	70.00
03/08/23	RB	Emails Lonnie Wise, Allie Rice; draft and edit tenant charts; phone conferences Ms. Rice	0.20	70.00
03/09/23	RB	Inspection tour of 11 units with Lonnie Wise and Megan Moore; emails Mr. Wise, Ms. Moore; phone conferences Nicholas DiNardo	0.20	70.00
03/10/23	RB	Zoom conference Nicholas DiNardo, Lonnie Wise, Shannon Price; draft and edit current tenant papers; emails Katrina Frei, Mr. DiNardo, Mr. Wise, Allie Rice; review Gateway portal	0.50	175.00
03/13/23	RB	Edit motion re Joseph Lentine motions; phone conferences Mr. Lentine, Allie Rice, Kelley Allesee, Tara Weber and Zoom with Stephanie Moes, Stacy Purcell, Lonnie Wright and Shannon Price; texts Mr. Lentine and Ms. Rice; emails Ms. Rice, Nicholas DiNardo, Matthew Horwitz, Ms. Allesee, Ms. Moes, Ms. Purcell, Mr. Wright, Mr. Wise, Katrina Frei; inspect 649 Steiner exterior; conferences Nate Cash and Angel Strunk; draft and edit current tenant charts; edit Gateway form lease	1.20	420.00
03/14/23	RB	Review Joseph Lentine filing; draft and edit current tenant charts; edit Gateway lease; emails Stacy Purcell, Shannon Price, Stephanie Moes	0.50	175.00
03/15/23	RB	Edit Gateway lease; emails Kelley Allesee, Shannon Price, Stephanie Moes, Stacy Purcell, Erica Faaborg, Allie Rice, Erin Lovitt; phone conferences Ms. Rice, Hamilton County Treasurer; check Gateway portal; review 7 Magistrates Orders and edit chart	1.00	350.00
03/16/23	RB	Emails Lonnie Wise, Shannon Price, Kelley Allesee, Allie Rice; inspect properties with Mr. Wise and Megan Moore; edit tenant charts; phone conferences Ms. Allesee and Ms. Rice; check Gateway portal; properties drive by	0.50	175.00
03/17/23	RB	Draft response to John Klosterman 3/7/23 filing; phone conference Rumpke; emails Lonnie Wise, Megan Moore and Shannon Price; draft opposition to Joseph Lentine/TriState Organization, Inc. motion to intervene; check Gateway portal	0.70	245.00
03/20/23	RB	Emails Kelley Allesee, Allie Rice, Stacy Purcell, Meghan Moore, Jennifer Donathan; check Gateway portal; phone conference Shannon Price; edit Gateway lease and tenant charts	0.30	105.00

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DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
03/21/23	RB	Emails Allie Rice, Megan Moore, Taylor McComb, Katrina Frei; edit Gateway lease and tenant charts; check Gateway portal	0.20	70.00
03/22/23	RB	Emails Allie Rice, Megan Moore, Taylor McComb, Joseph Lentine, Katrina Frei; draft responses to Joseph Lentine motion to intervene and John Klosterman 3/20/23 filing; check Gateway portal	1.00	350.00
03/23/23	RB	Phone conference Kelley Allesee; check Gateway portal; draft response to Joseph Lentine second motion to intervene	0.70	245.00
03/24/23	RB	Edit opposition to Joseph Lentine second motion to intervene; emails Taylor McComb, Allie Rice; check Gateway portal; phone conference Kelley Allesee and Andrew Garth; draft settlement and release agreement	1.50	525.00
03/25/23	RB	Properties drive by; emails Kelley Allesee and Andrew Garth; draft notice to commence suit and legal research on same	1.00	350.00
03/27/23	RB	Phone conferences Allie Rice and Jennifer Donathan; edit filings in response to John Klosterman and Joseph Lentine filings; email and voicemail Kelley Allesee; emails Stacy Purcell and Ms. Rice	1.00	350.00
03/28/23	RB	Emails Kelley Allesee; review Landbank filing; phone conferences Ms. Allesee, Allie Rice and staff; edit tenant charts; conference Denise Hollingsworth; edit notices to commence suit	1.80	630.00
03/29/23	RB	Edit notices to commence; conference Denise Hollingsworth; emails Mark Bissinger, Robert Hines, Dave Boe, Katrina Frei; phone conference Mr. Bissinger	0.90	315.00
03/30/23	RB	Phone conferences Jennifer Donathan and Kelley Allesee	0.10	35.00
03/31/23	RB	Phone conferences Kelley Allesee and Jennifer Donathan; pick up Sheriff's returns on notices to commence suit	0.80	280.00
04/03/23	RB	Phone conferences Allie Rice, Kelley Allesee and Jennifer Donathan; emails Mr. Rice, Ms. Allesee, Ms. Donathan; review Gateway portal; review John Klosterman and Landbank filings in vexatious litigator case	0.20	70.00
04/04/23	RB	Phone conferences Jennifer Donathan; review Gateway portal; emails Allie Rice, Ms. Donathan; edit rent roll	0.30	105.00
04/05/23	RB	Phone conferences Jennifer Donathan and Mark Bissinger; emails Katrina Frei	0.30	105.00

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DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
04/06/23	RB	Phone conferences Kelley Allesee and Jennifer Donathan; PACER search Joseph Lentine; emails Allie Rice	0.20	70.00
04/07/23	RB	Phone conferences Allie Rice; check docket sheets in federal criminal action and Hamilton County; finalize receiver report to 3/31/23; review Gateway portal; emails Allie Rice	0.30	105.00
04/10/23	RB	Draft letter to Katrina Frei; draft affidavits of service of notice to commence; emails Katrina Frei and Allie Rice; phone conference Kelley Allesee	0.20	70.00
04/11/23	RB	Emails Allie Rice; Kelley Allesee; check Gateway portal; edit affidavits on service of notice to commence suit and have notarized	0.50	175.00
04/12/23	RB	Conference Kelley Allesee; emails Allie Rice, Ms. Allesee, Robert Calabrese; record affidavits on service of notices to commence suit	0.50	175.00
04/13/23	RB	Edit receiver expense and fee charts; phone conferences Kelley Allesee and Jennifer Donathan; emails Ms. Allesee and Erica Faaborg	0.50	175.00
04/14/23	RB	Emails Allie Rice, Kelley Allesee; review recent filings in Landbank case; visit Gateway portal	0.10	35.00
04/17/23	RB	Review Gateway portal; emails Karina Feis, Jackie Olson; phone conferences Ms. Olson and with Kelley Allesee, Allie Rice and Meagan Monroe	0.20	70.00
04/18/23	RB	Email and phone conference Jackie Olson	0.50	175.00
04/19/23	RB	Emails Philip Denning and Kelley Allesee; read John Klosterman 4/18/23 filing; edit chart of Mr. Klosterman filings; phone conference and email Katrina Frei	0.20	70.00
04/20/23	RB	Emails Jackie Olson	0.20	70.00
04/21/23	RB	Email Meghan Roark; email Kate Burroughs, Shannon Price and Erica Faaborg	0.20	70.00
04/24/23	RB	Emails Meghan Roark	0.10	35.00
04/25/23	RB	Emails Kelley Allesee, Allie Rice, Ronald Shouse; edit expense chart	0.30	105.00
04/26/23	RB	Emails Kelley Allesee and Allie Rice; texts Duke Energy; docket review	0.20	70.00
04/27/23	RB	Draft objection to John Klosterman 4/18/23 motion	0.30	105.00
04/28/23	RB	Emails Kelley Allesee and Allie Rice; letter to Duke Energy	0.20	70.00
05/01/23	RB	Emails Kelley Allesee, Brian Pyles, Anna Ausman, LaTasha Brewer, Ronald Shouse, Chuck Stephen;	0.50	175.00

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DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
		conference Ms. Allesee; prepare for closing and execute dox at Prominent Title		
05/02/23	RB	Emails Brian Pyles, Anna Asmun, Christian Donovan; meeting Ronald Shouse at 637 Steiner; letter Anna Ausman; phone conference Matthew Flannery; review James Neiberding filings	1.00	350.00
05/03/23	RB	Edit objection to John Klosterman motion to disqualify Magistrate Anita Berding; draft response to application for payment to TSO and Joseph Lentine; emails Allie Rice, John Klosterman, Robert Hines, Erin Lovitt, Kelley Allesee; review Gateway portal and Clerk of Courts website	0.60	210.00
05/04/23	RB	Phone conferences Kelley Allesee; texts Susan Zurface; review John Klosterman 5/3/23 filings; legal research; emails Christian Donovan and Brian Pyles, Alexis Royse	1.20	420.00
05/05/23	RB	Review John Klosterman filing; draft response to Joseph Lentine application; review Gateway portal; email Jennifer Donathan	0.40	140.00
05/08/23	RB	Review John Klosterman filings; legal research; review Gateway portal; phone conferences Kelley Allesee	2.50	875.00
05/09/23	RB	Emails Allie Rice; phone conferences Joseph Lentine; draft reply to TSO and Mr. Lentine application for payment	1.00	350.00
05/10/23	RB	Phone conferences Joseph Lentine and James Nieberding; emails Mr. Lentine, Susan Zurface, Kelley Allesee, Katrina Frei; edit response to TSO & Mr. Lentine application	1.50	525.00
05/11/23	RB	Emails Allie Rice	0.10	35.00
05/15/23	RB	Phone conference Kelly Allesee; review Gateway portal	0.30	105.00
05/16/23	RB	Review Gateway report; review Gateway portal; edit GCWW chart; email Kelley Allesee	1.00	350.00
05/17/23	RB	Emails Tony Searls and Kelley Allesee; assemble documents for review	0.30	105.00
05/18/23	RB	Emails Allie Rice and Cynthia Fischer	0.20	70.00
05/19/23	RB	Emails Cynthia Fischer; check docket sheets and Gateway portal	0.20	70.00
05/22/23	RB	Prepare for and attend conference with Cynthia Fischer	0.50	175.00
05/23/23	RB	Prepare for and attend hearing in State v. Klosterman; prepare for 5/24/23 status report	0.60	210.00
05/24/23	RB	Prepare for and attend hearing and report before Magistrate Berding; courthouse conferences Kelley	1.00	350.00



Dentons Bingham Greenebaum LLP

Invoice No.: \*\*\*\*\*

Konza LLC  
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DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
		Allesee and Cynthia Fischer; James Nieberding and Joseph Lentine; check clerk's website on criminal actions; edit GCWW charts; phone conferences Mr. Lentine and Ms. Allesee		
05/25/23	RB	Emails Kelley Allesee	0.10	35.00
05/26/23	RB	Docket checks	0.10	35.00
05/30/23	RB	Phone conferences Joseph Lentine; emails Kelley Allesee; draft affidavits as to service of notices to commence suit	0.50	175.00
05/31/23	RB	Phone conferences Cynthia Fischer; emails Allie Rice and David Donnett office; Kelley Allesee; edit affidavits of TSO/Joseph Lentine mechanic's liens	0.50	175.00
06/01/23	RB	Edit affidavits on TSO/Joseph Lentine mechanic's lien; emails David Donnett office	0.30	105.00
06/02/23	RB	Prepare for and attend office conferences Cynthia Fischer; phone conference Joseph Lentine; record 3 affidavits on service of notice to commence suit; emails Ms. Fischer and Kelley Allesee	1.50	525.00
06/05/23	RB	Office conference Cynthia Fischer; draft second receiver fee application etc.; organize pleadings files; emails Ms. Fischer and Kelley Allesee	1.30	455.00
06/06/23	RB	Draft receiver motion for fees and expenses and discharge and termination; review Landbank 6/5/23 filing	0.70	245.00
06/07/23	RB	Emails Allie Rice and Jennifer Donathan; phone conferences Kelley Allesee and Ms. Donathan	0.30	105.00
06/08/23	RB	Emails Nick Stone; review dockets sheets	0.10	35.00
06/12/23	RB	Edit second fee application; email Allie Rice	0.50	175.00
06/20/23	RB	Emails Amy Higgins	0.10	35.00
06/21/23	RB	Phone conference Allie Rice; review TriState Organization, Inc./Joseph Lentine filings; edit GCWW charts	0.40	140.00
06/22/23	RB	Review Gateway billing	0.50	175.00
06/23/23	RB	Edit Gateway charts; phone conference Cynthia Fischer	0.10	35.00
06/26/23	RB	Attend to GCWW billing; email Melissa Darby; prepare for 7/5/23 hearing; review docket sheets	0.30	105.00
06/27/23	RB	Edit Gateway billing charts	0.10	35.00
06/28/23	RB	Phone conference Cynthia Fischer; email Allie Rice; edit Gateway charts	0.20	70.00
06/29/23	RB	Prepare for attend meeting with Cynthia Fischer; draft	1.50	525.00

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DATE	ATTORNEY/ PARALEGAL	DESCRIPTION	HOURS	AMOUNT
		affidavit		
06/30/23	RB	Draft affidavit	1.00	350.00
07/03/23	RB	Edit affidavit; prepare for 7/5/23 hearings; review John Klosterman filing	2.00	700.00
07/05/23	RB	Edit affidavit; prepare for and attend hearings	3.00	1,050.00
07/07/23	RB	Phone conferences Amy Higgins and Cynthia Fischer; review John Klosterman 7/5/23 filing and clerk's website	0.10	35.00
07/11/23	RB	Review vexatious litigator order; check docket sheets; draft responses to 7/3 and 7/5/23 John Klosterman filings	0.30	105.00
07/12/23	RB	Edit second fee application; edit responses to 7/3 and 7/5/23 John Klosterman filings	0.40	140.00
07/14/23	RB	Edit second fee application	0.40	140.00
07/17/23	RB	Emails Sara Sheets, Tom Mullikan, Kelley Allesee and Nick Stone; review John Klosterman 7/14/23 filings	0.20	70.00
07/21/23	RB	Email Mark Grundy	0.30	105.00
07/24/23	RB	Review federal PPP litigation filings; phone conference Cynthia Fischer	0.10	35.00
08/02/23	RB	Edit second fee application	0.20	70.00
08/04/23	RB	Emails Allie Rice	0.10	35.00
08/10/23	RB	Email Allie Rice	0.10	35.00
08/11/23	RB	Prepare for and attend Google conference Allie Rice and Sabrina Hazen; edit second fee application	0.50	175.00
08/14/23	RB	Edit second fee application; email Cynthia Fischer	0.30	105.00
08/15/23	RB	Email John Klosterman; text Susan Zurface	0.10	35.00
08/16/23	RB	Email Allie Rice	0.10	35.00
08/17/23	RB	Emails Allie Rice	0.10	35.00
08/21/23	RB	Email John Klosterman	0.10	35.00
08/25/23	RB	Phone conference Cynthia Fischer	0.30	105.00
08/28/23	RB	Phone conference Cynthia Fischer; edit second fee application	0.10	35.00
08/29/23	RB	Draft memo in opposition to John Klosterman 8/21/23 motion	0.20	70.00
FEES FOR PROFESSIONAL SERVICES RENDERED				\$ 28,035.00
OUT-OF-POCKET EXPENSES				

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1/6/23	Data Hosting	39.34
1/31/23	Data Hosting	39.34
2/28/23	Data Hosting	53.36
2/28/23	Shipping/ Order Distribution - PAID TO: FedEx	23.61
3/21/23	Shipping/ Order Distribution - PAID TO: FedEx	17.67
4/1/23	Data Hosting	10.00
4/11/23	Shipping/ Order Distribution - PAID TO: FedEx	20.52
4/14/23	Fees/Filing Fees - PAID TO: Hamilton County Sheriff's Office	132.00
5/9/23	Shipping/ Order Distribution - PAID TO: FedEx	17.25
5/16/23	Data Hosting	53.36
5/31/23	Data Hosting	53.36
6/30/23	Data Hosting	53.36
7/31/23	Data Hosting	53.36
8/31/23	Data Hosting	53.36

\$ 619.89

INVOICE TOTAL (USD)

\$ 28,654.89

SUMMARY OF PROFESSIONAL SERVICES

ATTORNEY/PARALEGAL	HOURS	RATE	AMOUNT
Richard Boydston	80.10	350.00	28,035.00
	80.10		28,035.00

# EXHIBIT E

## Fees Due to Receiver



9/7/23  
revisionCity v. Klosterman  
#A1905588Work descriptions, time and charges

date	description	receiver at \$300/hour	
		time	amount
11/30/22	inspect properties with Ronald Shouse, Luke Herman and Joseph Lentine; phone conferences Mr. Lentine	3.00	900.00
12/1/22	phone conferences Joseph Lentine; emails Erin Lovitt	.30	90.00
12/2/22	phone conferences Joseph Lentine; emails Angel Strunk, Mr. Lentine, Kelley Allesee; edit rent roll and organize papers for Landbank	1.20	360.00
12/5/22	edit fee applications; emails Angel Strunk, Joseph Lentine, Kelley Allesee and Erica Faaborg; phone conferences Dial One Security, Mr. Lentine; edit operation reports; review and file receiver's report	1.00	300.00
12/6/22	prepare for and attend status report before Magistrate Berding; phone conference Kelley Allesee; office conferences Joseph Lentine; properties drive by	2.00	600.00
12/7/22	office conference Joseph Lentine; emails and texts Mr. Lentine; properties drive by	1.00	300.00
12/8/22	phone conferences Joseph Lentine, Charles Pritchard; emails Mr. Pritchard, Kelley Allesee, Melissa Darby, Erica Faaborg, Kate Burroughs and Shannon Price	.70	210.00
12/9/22	emails Angel Strunk, Joseph Lentine, Chuck Pritchard; phone conferences Mr. Lentine, Chuck Pritchard; review pictures for Ron Shouse inspection list	.70	210.00
12/12/22	emails Kelley Allesee, Michael Galasso and Joseph Lentine; phone conference Mr. Lentine	.10	30.00
12/13/22	phone conferences and emails Joseph Lentine; properties drive by and photos	1.20	360.00
12/14/22	conferences Joseph Lentine; properties drive by; email Ron Shouse	1.20	360.00
12/15/22	phone conferences Joseph Lentine	.10	30.00
12/16/22	review 12/14/22 John Klosterman filing; emails Kelley Allesee; phone conferences	.80	240.00

date	description	receiver at \$300/hour	
		time	amount
	Joseph Lentine, Ms. Allesee and Shannon Price		
12/19/22	prepare for and attend hearing before Magistrate Berding; conference Kelley Allesee, Kate Burroughs and Shannon Price; emails Ms. Allesee	0	0
12/20/22	file Magistrate's Order and have served; phone conferences Joseph Lentine and Robert Calabreze	.80	240.00
12/22/22	phone conferences Tara Weber, Joseph Lentine and Kelley Allesee; email Ms. Weber	.20	60.00
12/23/22	phone conferences Joseph Lentine	.20	60.00
12/26/22	phone conferences Joseph Lentine	.20	60.00
12/27/22	phone conferences Joseph Lentine, GCWW; emails GCWW and Kelley Allesee	.60	180.00
12/28/22	phone conferences Joseph Lentine	.10	30.00
12/29/22	review John Klosterman 12/28/22 filing and draft response; emails Kelley Allesee and Jennifer Donathan; phone conferences Joseph Lentine	.30	90.00
12/30/22	conference Alexis Royse; phone conferences Jennifer Donathan and Joseph Lentine; emails Kelley Allesee and Tara Weber; draft response to John Klosterman 12/28/22 filing	.50	150.00
1/1/23	phone conferences Joseph Lentine; review 12/21/22 court of appeals decision in John Klosterman criminal case	.20	60.00
1/2/23	email Kelley Allesee	0	0
1/3/23	phone conferences Joseph Lentine; emails Kelley Allesee	.50	150.00
1/4/23	email Joseph Lentine	0	0
1/5/23	phone conferences Joseph Lentine	0	0
1/6/23	edit response to John Klosterman 12/28/22 filing	0	0
1/9/23	emails Joseph Lentine; conference Allen Teetor; properties drive by; phone conferences Jennifer Donathan, Liz Eddy; conference Laura Finke; review Landbank motion; attend to filing and service of receiver's report	1.20	360.00
1/10/23	phone conferences Dion Crockett, Joseph Lentine and Kelley Allesee; emails Ms. Allesee and Erica Faaborg	1.10	330.00

date	description	receiver at \$300/hour	
		time	amount
1/11/23	phone conferences Dion Crockett, Joseph Lentine, Jan Michele Lemon Kenney and others, Duke Energy; emails Allie Rice, Jennifer Donathan, Liz Eddy	1.50	450.00
1/12/23	phone conferences Duke Energy, Joseph Lentine and Robert Jones; emails John Shrider and Kelley Allesee	0	0
1/13/23	phone conferences Joseph Lentine, Robert Jones, Shannon Price, Allie Rice; meeting Mr. Jones; properties drive by; emails Stacy Purcell and Shannon Price, John Schrider	1.50	450.00
1/15/23	properties drive by; email Stacy Purcell (1/14/23) and file review; texts Allie Rice	1.00	300.00
1/17/23	emails Allie Rice, Angel Strunk, Joseph Lentine, Shannon Price, Stacy Purcell; phone conferences Mr. Lentine, Ms. Rice, Ms. Purcell and Duke Energy	.70	210.00
1/18/23	phone conferences Joseph Lentine and Kelley Allesee; emails Mr. Lentine and Erin Lovitt	.50	150.00
1/19/23	phone conferences Allie Rice and Kelley Allesee; emails Ms. Rice, Ms. Allesee, Angel Strunk, Brian Pyles; office conference Ms. Allesee; emails Joseph Lentine, Ms. Strunk, Ms. Rice	1.50	450.00
1/20/23	phone conferences Allie Rice, Joseph Lentine, Patrick Hanley; emails Kelley Allesee, Ms. Rice and Mr. Lentine	.50	150.00
1/21/23	phone conference Joseph Lentine	0	0
1/23/23	phone conferences Joseph Lentine and Kelley Allesee; emails Mr. Lentine, Erin Lovett; office conference Mr. Lentine; review Gateway contract; deliver letter to Allie Rice; properties drive by; meeting with Mr. Lentine	1.50	450.00
1/24/23	emails Jennifer Donathan, Brian Pyles, Stacy Purcell, Joseph Lentine, Erin Lovitt; prepare for and attend meeting with Kelley Allesee and Joseph Lentine; phone conferences Ms. Allesee	2.50	750.00
1/25/23	emails Stacey Purcell, Joseph Lentine, Allie Rice, Jennifer Donathan, Brian Pyles, Kelley Allesee, Robert Calabreze; phone conferences Allen Teetor, Ms. Donathan,	2.50	750.00

date	description	receiver at \$300/hour	
		time	amount
	Ms. Allesee; inspect 654 Steiner; properties drive by; conference Ms. Allesee and Mr. Lentine; letter Ty Foster; review Gateway portal		
1/26/23	phone conferences Bobby Thompson, Allie Rice, Joseph Lentine; emails Ms. Rice, Mr. Lentine; texts Robert Wells	1.20	360.00
1/27/23	phone conference Joseph Lentine; emails Allie Rice; review John Klosterman filing	.80	240.00
1/28/23	phone conference Joseph Lentine	0	0
1/29/23	phone conference Kelley Allesee	0	0
1/30/23	phone conferences Ty Foster, Joseph Lentine, Jennifer Donathan	.70	210.00
1/31/23	prepare for and attend appearance before Magistrate Berding; post appearance conferences Joseph Lentine and Amy Higgins and Kelley Allesee; phone conference Jennifer Donathan; emails Alexis Royse	1.50	450.00
2/1/23	phone conferences Allie Rice and David Donnett, Robert Jones, Matthew Flannery, Kelley Allesee; emails Ms. Rice, Joseph Lentine, Stacy Purcell; review 1/31/23 case filings	1.30	390.00
2/2/23	phone conferences Robert Jones, Joseph Lentine	.20	60.00
2/3/23	properties drive by; text Allie Rice; phone conferences Matthew Flannery, Ms. Rice, Kelley Allesee and Philip Denning; review John Klosterman filings; email Deanna White	.70	210.00
2/6/23	phone conference Allie Rice; texts Allen Teetor; emails Mr. Rice, Jennifer Donathan, Joseph Lentine, Angel Strunk, Tara Weber	.70	210.00
2/7/23	phone conferences Tara Weber, Joseph Lentine; emails Allie Rice, Angel Strunk, Ms. Weber; voice mail Lisa Massingill	.30	90.00
2/8/23	emails Allie Rice, Megan Moore, Kelley Allesee; phone conferences Joseph Lentine, Angel Strunk and Ms. Allesee; emails Cincinnati Fire Department	1.20	360.00
2/10/23	phone conferences Joseph Lentine, Allie Rice, St. Vincent de Paul/Mipaandbob and , email to them	.30	90.00

date	description	receiver at \$300/hour	
		time	amount
2/13/23	emails David Boe; phone conferences Joseph Lentine and Kelley Allesee; review Landbank filing	.30	90.00
2/14/23	emails Joseph Lentine, Mark Bissinger, Allie Rice, Davie Boe	.30	90.00
2/15/23	phone conference Joseph Lentine; emails Susan Zurface, Mr. Lentine, Allie Rice	.30	90.00
2/16/23	phone conferences Joseph Lentine; emails Mr. Lentine and Allie Rice	.30	90.00
2/17/23	phone conferences Joseph Lentine and Kelley Allesee; review receiver's 1/1-20/23 report for filing and have filed and served; review Ms. Allesee email and attachments; emails Ms. Allesee	1.10	330.00
2/20/23	emails Allie Rice, Megan Moore, Rumpke and Joseph Lentine	.30	90.00
2/21/23	review Kelley Allesee 2/20/23 letter and enclosures; emails Megan Moore, Energy Insurance, Matthew Kincaid, Allie Rice; phone conferences Joseph Lentine; prepare for and attend hearing before Magistrate Berding; conference Ms. Allesee and Amy Higgins	.80	240.00
2/22/23	emails Megan Moore, Jennifer Donathan, Kelley Allesee	.20	60.00
2/23/23	draft Civ.R.45(B) motion; phone conference Allie Rice and Megan Moore; review Gateway portal; emails Ms. Rice, Ms. Moore, Mark Bessinger, Jennifer Donathan and Joseph Lentine; meeting with Mr. Lentine; properties drive by	1.00	300.00
2/24/23	phone conferences Matthew Flannery; emails Allie Rice, Nicholas DiNardo, Kelley Allesee; draft chart on rent deposits; edit Civ.R. 54(B) motion	1.50	450.00
2/27/22	edit Civ.R. 54(B) motion; phone conference Kelley Allesee; edit 12/1/22-2/24/23 fees and expenses summary; emails Ms. Allesee	1.00	300.00
2/28/23	internet searches Sedamsville; phone conferences Joseph Lentine and Kelley Allesee; emails Allie Rice and Mr. Lentine	.80	240.00
3/1/23	phone conference Allie Rice, David Mussari, Kelley Allesee, Philip Denning, Madeline	2.00	600.00

date	description	receiver at \$300/hour	
		time	amount
	Otilie, Randy Tucker; emails Ms. Rice, Mr. Lentine, Ms. Allesee, Amy Higgins		
3/2/23	review Joseph Lentine filings; emails Matthew Flannery, Allie Rice, Nicholas DiNardo, Michelle Alfini, Joseph Lentine; phone conferences Charles Prichard, Mr. DiNardo, Ms. Flannery, Kelley Allesee	.80	240.00
3/3/23	emails Kelley Allesee, Amy Higgins, Matthew Flannery; Nicholas DiNardo, phone conferences Ms. Allesee and Mr. Flannery	1.00	300.00
3/4/23	prepare for meeting with Legal Aid, City and Landbank	1.00	300.00
3/5/23	prepare for Zoom meeting with Legal Aid, City and Landbank; draft current tenant charts	2.00	600.00
3/6/23	emails Kelley Allesee, Stacy Purcell, Allie Rice, Lonnie Wise; Amy Higgins; draft receiver's Gateway income and expense report 1/20-3/4/23 and letter to tenants; review Joseph Lentine mechanics liens; prepare for and attend Legal Aid, City and Landbank conference call; phone conferences Ms. Allesee, Selena Reeder, Ms. Higgins, Michelle Alfini, Ms. Rice	2.50	750.00
3/7/23	review John Klosterman filings; emails Allie Rice	.20	60.00
3/8/23	emails Lonnie Wise, Allie Rice; draft and edit tenant charts; phone conferences Ms. Rice	1.10	330.00
3/9/23	inspection tour of 11 units with Lonnie Wise and Megan Moore; emails Mr. Wise, Ms. Moore; phone conferences Nicholas DiNardo	0	0
3/10/23	Zoom conference Nicholas DiNardo, Lonnie Wise, Shannon Price; draft and edit current tenant papers; emails Katrina Frei, Mr. DiNardo, Mr. Wise, Allie Rice; review Gateway portal	3.50	1,050.00
3/13/23	edit motion re Joseph Lentine motions; phone conferences Mr. Lentine, Allie Rice, Kelley Allesee, Tara Weber and Zoom with Stephanie Moes, Stacy Purcell, Lonnie Wright and Shannon Price; texts Mr. Lentine and Ms. Rice; emails Ms. Rice, Nicholas DiNardo, Matthew Horwitz, Ms. Allesee,	4.00	1,200.00



date	description	receiver at \$300/hour	
		time	amount
	Ms. Moes, Ms. Purcell, Mr. Wright, Mr. Wise, Katrina Frei; inspect 649 Steiner exterior; conferences Nate Cash and Angel Strunk; draft and edit current tenant charts; edit Gateway form lease		
3/14/23	review Joseph Lentine filing; draft and edit current tenant charts; edit Gateway lease; emails Stacy Purcell, Shannon Price, Stephanie Moes	2.00	600.00
3/15/23	edit Gateway lease; emails Kelley Allesee, Shannon Price, Stephanie Moes, Stacy Purcell, Erica Faaborg, Allie Rice, Erin Lovitt; phone conferences Ms. Rice, Hamilton County Treasurer; check Gateway portal; review 7 Magistrates Orders and edit chart	2.50	750.00
3/16/23	emails Lonnie Wise, Shannon Price, Kelley Allesee, Allie Rice; inspect properties with Mr. Wise and Megan Moore; edit tenant charts; phone conferences Ms. Allesee and Ms. Rice; check Gateway portal; properties drive by	3.00	900.00
3/17/23	draft response to John Klosterman 3/7/23 filing; phone conference Rumpke; emails Lonnie Wise, Megan Moore and Shannon Price; draft opposition to Joseph Lentine/TriState Organization, Inc. motion to intervene; check Gateway portal	1.20	360.00
3/20/23	emails Kelley Allesee, Allie Rice, Stacy Purcell, Meghan Moore, Jennifer Donathan; check Gateway portal; phone conference Shannon Price; edit Gateway lease and tenant charts	1.20	360.00
3/21/23	emails Allie Rice, Megan Moore, Taylor McComb, Katrina Frei; edit Gateway lease and tenant charts; check Gateway portal	2.00	600.00
3/22/23	emails Allie Rice, Megan Moore, Taylor McComb, Joseph Lentine, Katrina Frei; draft responses to Joseph Lentine motion to intervene and John Klosterman 3/20/23 filing; check Gateway portal	1.00	300.00
3/23/23	phone conference Kelley Allesee; check Gateway portal; draft response to Joseph Lentine second motion to intervene	.80	240.00

date	description	receiver at \$300/hour	
		time	amount
3/24/23	edit opposition to Joseph Lentine second motion to intervene; emails Taylor McComb, Allie Rice; check Gateway portal; phone conference Kelley Allesee and Andrew Garth; draft settlement and release agreement	1.50	450.00
3/25/23	properties drive by; emails Kelley Allesee and Andrew Garth; draft notice to commence suit and legal research on same	1.50	450.00
3/27/23	phone conferences Allie Rice and Jennifer Donathan; edit filings in response to John Klosterman and Joseph Lentine filings; email and voicemail Kelley Allesee; emails Stacy Purcell and Ms. Rice	0	0
3/28/23	emails Kelley Allesee; review Landbank filing; phone conferences Ms. Allesee, Allie Rice and staff; edit tenant charts; conference Denise Hollingsworth; edit notices to commence suit	1.20	360.00
3/29/23	edit notices to commence; conference Denise Hollingsworth; emails Mark Bissinger, Robert Hines, Dave Boe, Katrina Frei; phone conference Mr. Bissinger	1.40	420.00
3/30/23	phone conferences Jennifer Donathan and Kelley Allesee	1.50	450.00
3/31/23	phone conferences Kelley Allesee and Jennifer Donathan; pick up Sheriff's returns on notices to commence suit	1.20	360.00
4/3/23	phone conferences Allie Rice, Kelley Allesee and Jennifer Donathan; emails Mr. Rice, Ms. Allesee, Ms. Donathan; review Gateway portal; review John Klosterman and Landbank filings in vexatious litigator case	0	0
4/4/23	phone conferences Jennifer Donathan; review Gateway portal; emails Allie Rice, Ms. Donathan; edit rent roll	.70	210.00
4/5/23	phone conferences Jennifer Donathan and Mark Bissinger; emails Katrina Frei	.70	210.00
4/6/23	phone conferences Kelley Allesee and Jennifer Donathan; PACER search Joseph Lentine; emails Allie Rice	1.00	300.00
4/7/23	phone conferences Allie Rice; check docket sheets in federal criminal action and Hamilton County; finalize receiver report to	.80	240.00



date	description	receiver at \$300/hour	
		time	amount
	3/31/23; review Gateway portal; emails Allie Rice		
4/10/23	draft letter to Katrina Frei; draft affidavits of service of notice to commence; emails Katrina Frei and Allie Rice; phone conference Kelley Allesee	.80	240.00
4/11/23	emails Allie Rice; Kelley Allesee; review Gateway portal; edit affidavits on service of notice to commence suit and have notarized	1.50	450.00
4/12/23	conference Kelley Allesee; emails Allie Rice, Ms. Allesee, Robert Calabrese; record affidavits on service of notices to commence suit	5.00	1,500.00
4/13/23	edit receiver expense and fee charts; phone conferences Kelley Allesee and Jennifer Donathan; emails Ms. Allesee and Erica Faaborg	2.50	750.00
4/14/23	emails Allie Rice, Kelley Allesee; review recent filings in Landbank case; visit Gateway portal	.80	240.00
4/17/23	review Gateway portal; emails Karina Feis, Jackie Olson; phone conferences Ms. Olson and with Kelley Allesee, Allie Rice and Meagan Monroe	1.10	330.00
4/18/23	email and phone conference Jackie Olson	0	0
4/19/23	emails Philip Denning and Kelley Allesee; read John Klosterman 4/18/23 filing; edit chart of Mr. Klosterman filings; phone conference and email Katrina Frei	.70	210.00
4/20/23	emails Jackie Olson	.10	30.00
4/21/23	email Meghan Roark; email Kate Burroughs, Shannon Price and Erica Faaborg	.20	60.00
4/24/23	emails Meghan Roark	0	0
4/25/23	emails Kelley Allesee, Allie Rice, Ronald Shouse; edit expense chart	0	0
4/26/23	emails Kelley Allesee and Allie Rice; texts Duke Energy; docket review	0	0
4/27/23	draft objection to John Klosterman 4/18/23 motion	0	0
4/28/23	emails Kelley Allesee and Allie Rice; letter to Duke Energy	.20	60.00
5/1/23	emails Kelley Allesee, Brian Pyles, Anna Ausman, LaTasha Brewer, Ronald Shouse, Chuck Stephen; conference Ms. Allesee;	1.50	450.00

date	description	receiver at \$300/hour	
		time	amount
	prepare for closing and execute dox at Prominent Title		
5/2/23	emails Brian Pyles, Anna Asmun, Christian Donovan; meeting Ronald Shouse at 637 Steiner; letter Anna Ausman; phone conference Matthew Flannery; review James Neiberding filings	2.00	600.00
5/3/23	edit objection to John Klosterman motion to disqualify Magistrate Anita Berding; draft response to application for payment to TSO and Joseph Lentine; emails Allie Rice, John Klosterman, Robert Hines, Erin Lovitt, Kelley Allesee; review Gateway portal and Clerk of Courts website	.40	120.00
5/4/23	phone conferences Kelley Allesee; texts Susan Zurface; review John Klosterman 5/3/23 filings; legal research; emails Christian Donovan and Brian Pyles, Alexis Royse	.80	240.00
5/5/23	review John Klosterman filing; draft response to Joseph Lentine application; review Gateway portal; email Jennifer Donathan	.40	120.00
5/8/23	review John Klosterman filings; legal research; review Gateway portal; phone conferences Kelley Allesee	.20	60.00
5/9/23	emails Allie Rice; phone conferences Joseph Lentine; draft reply to TSO and Mr. Lentine application for payment	.50	150.00
5/10/23	phone conferences Joseph Lentine and James Nieberding; emails Mr. Lentine, Susan Zurface, Kelley Allesee, Katrina Frei; edit response to TSO & Mr. Lentine application	.50	150.00
5/11/23	emails Allie Rice	.10	30.00
5/15/23	phone conference Kelly Allesee; review Gateway portal	.30	90.00
5/16/23	review Gateway report; review Gateway portal; edit GCWW chart; email Kelley Allesee	0	0
5/17/23	emails Tony Searls and Kelley Allesee; assemble documents for review	.50	150.00
5/18/23	emails Allie Rice and Cynthia Fischer	0	0
5/19/23	emails Cynthia Fischer; check docket sheets and Gateway portal	.20	60.00

date	description	receiver at \$300/hour	
		time	amount
5/22/23	prepare for and attend conference with Cynthia Fischer	.50	150.00
5/23/23	prepare for and attend hearing in State v. Klosterman; prepare for 5/24/23 status report	.60	180.00
5/24/23	prepare for and attend hearing and report before Magistrate Berding; courthouse conferences Kelley Allesee and Cynthia Fischer; James Nieberding and Joseph Lentine; check clerk's website on criminal actions; edit GCWW charts; phone conferences Mr. Lentine and Ms. Allesee	1.00	300.00
5/25/23	emails Kelley Allesee	0	0
5/26/23	docket checks	0	0
5/30/23	phone conferences Joseph Lentine; emails Kelley Allesee; draft affidavits as to service of notices to commence suit	.20	60.00
5/31/23	phone conferences Cynthia Fischer; emails Allie Rice and David Donnett office; Kelley Allesee; edit affidavits of TSO/Joseph Lentine mechanic's liens	.50	150.00
6/1/23	edit affidavits on TSO/Joseph Lentine mechanic's lien; emails David Donnett office	0	0
6/2/23	office conference Cynthia Fischer; draft second receiver fee application etc.; organize pleadings files; emails Ms. Fischer and Kelley Allesee	1.50	450.00
6/5/23	office conference Cynthia Fischer; draft second receiver fee application etc.; organize pleadings files; emails Ms. Fischer and Kelley Allesee	1.00	300.00
6/6/23	draft receiver motion for fees and expenses and discharge and termination; review Landbank 6/5/23 filing	.10	30.00
6/7/23	emails Allie Rice and Jennifer Donathan; phone conferences Kelley Allesee and Ms. Donathan	.30	90.00
6/8/23	emails Nick Stone; review dockets sheets	0	0
6/12/23	edit second fee application; email Allie Rice	.50	150.00
6/20/23	emails Amy Higgins	0	0
6/21/23	phone conference Allie Rice; review TriState Organization, Inc./Joseph Lentine filings; edit GCWW charts	.20	60.00
6/22/23	review Gateway billing	0	0

date	description	receiver at \$300/hour	
		time	amount
6/23/23	edit Gateway charts; phone conference Cynthia Fischer	.20	60.00
6/26/23	attend to GCWW billing; email Melissa Darby; prepare for 7/5/23 hearing; review docket sheets	.70	210.00
6/27/23	edit Gateway billing charts	.50	150.00
6/28/23	phone conference Cynthia Fischer; email Allie Rice; edit Gateway charts	.30	90.00
6/29/23	prepare for attend meeting with Cynthia Fischer; draft affidavit	0	0
6/30/23	draft affidavit	1.00	300.00
7/3/23	edit affidavit; prepare for 7/5/23 hearings; review John Klosterman filing	0	0
7/5/23	edit affidavit; prepare for and attend hearings	0	0
7/7/23	phone conferences Amy Higgins and Cynthia Fischer; review John Klosterman 7/5/23 filing and clerk's website	.50	150.00
7/11/23	review vexatious litigator order; check docket sheets; draft responses to 7/3 and 7/5/23 John Klosterman filings	.20	60.00
7/12/23	edit second fee application; edit responses to 7/3 and 7/5/23 John Klosterman filings	.40	120.00
7/14/23	edit second fee application	0	0
7/17/23	emails Sara Sheets, Tom Mullikan, Kelley Allesee and Nick Stone; review John Klosterman 7/14/23 filings	.20	60.00
7/21/23	email Mark Grundy	0	0
7/24/23	review federal PPP litigation filings; phone conference Cynthia Fischer	.20	60.00
8/11/23	prepare for and attend Google Conference with Allie Rice and Sabrina Hazen; edit second fee application	.50	150.00
8/14/23	Edit second fee application; email Cynthia Fischer	.20	70.00
	totals	124.60	\$37,390.00

COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO

CITY OF CINCINNATI,	:	Case No. A1905588
	:	(Judge Wende C. Cross)
Plaintiff,	:	(Magistrate Anita P. Berding)
	:	
v.	:	
	:	ORDER GRANTING MOTION BY
JOHN KLOSTERMAN, et al.,	:	RECEIVER FOR APPROVAL OF
	:	PAYMENT OF FEES AND EXPENSES
Defendants.	:	FROM DECEMBER 1, 2022 THROUGH
	:	AUGUST 31, 2023 AND FOR ENTRY OF
	:	AN ORDER TERMINATING
	:	RECEIVERSHIP AND DISCHARGING
	:	<u>AND RELEASING RECEIVER</u>

This case comes before the Court on the Motion by Receiver for Approval of Payment of Fees and Expenses from December 1, 2022 through August 31, 2023 and for Entry of an Order Terminating Receivership and Discharging and Releasing Receiver (the “Motion”) filed by Konza, LLC as the receiver appointed in this judgment lien foreclosure action and the pleadings and papers of record and the docket entries. All capitalized terms in this Order not otherwise defined shall have the same meaning as given in the Motion.

The Court is of the opinion that the Motion is well taken and should be granted and therefore it is hereby

ORDERED, that the Motion is granted; and it is further

ORDERED, that the Receiver is entitled to payment of the Further Fees and Expenses and said payment is approved; and it is further

ORDERED, Prominent Title shall pay the sum of \$85,960.83 to the Receiver being the Escrow Balance (the “Payment to the Receiver”); and it is further

ORDERED, that upon receipt by the Receiver of the Escrow Balance, the Receiver shall

pay the proceeds in the order and amounts listed in the Motion and file and serve notice of said receipt and payments (the "Receiver Notice of Payments"); and it is further

ORDERED, that upon the filing of the Receiver Notice of Payments, the Receiver is discharged and the receivership is terminated and this action is concluded and closed; and it is further

ORDERED, that the Receiver and its agents and legal counsel are acquitted, discharged and released from any and all claims of whatever kind or nature arising out of or related to this action, the Receivership, and the Properties; and it is further

ORDERED, that (1) all parties to this action and (2) all persons and entities who have filed any motion, notice or other paper in this action and (3) all persons and entities who receive notice of this Order are enjoined from filing or making or continuing any action to enforce or pursue any claim in this action, or in any other action in this Court or in any other Court, in any manner seeking any relief from the Receiver or any of its agents and legal counsel with respect to any matter addressed in this action or concerning the Receivership, the Properties (or any of them) save and except to enforce the provisions of this Order; and it is further

ORDERED, that any violation of the foregoing injunction shall be considered by the Court as in direct contempt of this Court and will be subject to any and all sanctions available to this Court for direct or indirect contempt of court; and it is further

ORDERED, that the Court expressly determines that there is no just reason for delay and this order is final and appealable.

SO ORDERED.

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Judge Wende C. Cross

submitted by,  
Richard Boydston (0022360)  
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